# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

FIREMAN'S FUND INSURANCE COMPANY, Plaintiff	)
V.	) CIVIL NO. 04-11578 PBS
FIRE SYSTEMS, INC., ET AL, Defendants	) ) )

## DEFENDANT, PRO CON, INC. LIST OF WITNESSES AND EXHIBITS

Now comes the Defendant, Pro Con, Inc., in the above entitled action and identifies the following witnesses to be called and exhibits to be introduced at trial.

### I. WITNESSES

- Michael Zurowski
   275 Rukstella Road
   Brooklyn, Connecticut
   860-774-8855
- Cory George Rogers 169 Palmer Street New Bedford, MA
- 3. Charles Higgins 3 Cook Street Douglas, MA 508-476-2762
- Jacinto M. Medeiros
   Pulaski Road
   (Chepachet) West Gloucester, RI
   401-568-5669
- 5. Scott Duplisea 27 Gen Drive Willimantic, Conn. 860-208-7157

- 6. Richard Greene 1359 Hooksett Road Hooksett, NH 603-623-8811
- 7. Ron Bouchard
  Fire Consulting Associates, Inc.
  PO Box 6664
  Providence, RI
  401-467-6014

#### II. EXHIBITS

- 1. Contract between F.C. R. Associates, L.L. C,., owner Pro con, Inc., contractor dated December 4, 2000.
- Contract between Pro con, Inc., contractor Paquette Electric Co., Inc. subcontractor dated July 27, 2001.
- 3. Contract between Pro Con, Inc., contractor, Fire Suppression Systems of New England, Inc., subcontractor dated July 27, 2001.
- 4. Alarm print out (exhibit 12 at Mr. Klem's deposition)
- 5. Weather data print out
- 6. 1/16/03 Test/Inspection report of FSI (exhibit 1 at Corey Rogers deposition)
- 7. 10/10/02 Service Acknowledgement of FSI (exhibit 2 at Corey Rogers deposition)
- 8. 11/20/02 Test/Inspection report of FSI (exhibit 3 at Corey Rogers deposition)
- 9. Tech Control Systems Job Work Order 1/16/03 (exhibit 4 at Corey Rogers deposition)
- Contractor's Material and Test Certificate for Aboveground Piping dated 5/17/021
- 11. Automatic Sprinkler Systems Contractor's Material and Test Certificate for Underground Piping dated 5/3/02

- 12. Photograph of the FSI tag (exhibit 6 at Mr. Klem's deposition)
- 13. Application for permit to do wiring
- 14. Building permit, Field inspection
- 15. Occupancy permit
- 16. Tech Control Systems Certificate of Completion
- 17. Dartmouth Fire District Pre fire inspection form dated 4/30/02
- 18. Facility Services and Engineering correspondence dated 4/29/02
- Conway engineering Construction Control correspondence dated 4/30/02

By its attorney,

\S\ Kathleen C. Tulloh Brink
Kathleen C. Tulloh Brink
B.B.O. No. 550274
Law Offices of Jacqueline L. Allen
262 Washington Street, Suite 601
Boston, MA 02108
617-878-4631

#### **CERTIFICATE OF SERVICE**

I, Kathleen C. Tulloh Brink, attorney for the Defendants, Pro Con, Inc., in the above-entitled action, hereby certify that I mailed a copy of the within documents to all counsel.